## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

**SUE MI TERRY,** 

Defendant.

Any opposition to this motion shall be filed by **March 21, 2025**.

Dated: March 7, 2025 New York, New York

No. 24-cr-00427-LGS

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

## MOTION OF THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS FOR LEAVE TO FILE AMICUS CURIAE BRIEF

The Reporters Committee for Freedom of the Press ("Reporters Committee" or "amicus") respectfully moves for leave to file the accompanying amicus curiae brief in support of Defendant Sue Mi Terry's Motion to Dismiss Indictment. Defendant consents to this filing. The United States opposes this filing.

"District courts have broad discretion to permit or deny the appearance of amici curiae in a given case." *Micula v. Gov't of Romania*, No. 15 Misc. 107, 2015 WL 4643180, at \*1 (S.D.N.Y. Aug. 5, 2015). Amicus briefs are appropriately accepted "when the amicus has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide." *Auto. Club of N.Y., Inc. v. Port Auth. of N.Y. & N.J.*, No. 11 Civ. 6746 (RJH), 2011 WL 5865296, at \*2 (S.D.N.Y. Nov. 22, 2011) (internal quotation and citation omitted); *accord C&A Carbone, Inc. v. County of Rockland, N.Y.*, No. 08-cv-6459-ER, 2014 WL 1202699, at \*3 (S.D.N.Y. Mar. 24, 2014).

Such is the case here. The Reporters Committee is an unincorporated nonprofit association founded by leading journalists and media lawyers in 1970 when the nation's news media faced an unprecedented wave of government subpoenas forcing reporters to name